

UNITED STATES DISTRICT COURT  
for the  
Southern District of Texas

JUL 30 2018

Clerk of Court

United States of America )  
 Edna Yaritza ZAMARRIPA, YOB: 1993, COC: US )  
 Consuelo Teresita ZAMARRIPA, YOB: 1970, COC: US )  
 AKA: Consuelo Teresita RAMIREZ )

) Case No. M-18-1549-M  
 (Related: M-17-1583-m)

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 5, 2017 in the county of Starr in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

18 United States Code § 554

Did knowingly and willfully conspired, aided, and abetted in an attempt to export or send from the United States, any merchandise, article, or object, to wit: approximately 2,000 rounds of 7.62x39mm caliber ammunition, contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

*Approved by David A. Lindmark*  
*P. E.*

*Gerardo Mercado*  
 Complainant's signature

Gerardo Mercado, HSI Special Agent  
 Printed name and title

Sworn to before me and signed in my presence.

Date: 7/30/2018

*J. Scott Hacker*  
 Judge's signature

City and state: McAllen, Texas

J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

**ATTACHMENT A**

- I. On or about September 5, 2017, Homeland Security Investigations (HSI) Counter-Proliferation Investigations (CPI) Special Agents (SAs) and HSI Task Force Officers (TFOs) conducted surveillance of Sonia Susette LUCIO and Consuelo Teresita ZAMARRIPA after HSI Agents observed LUCIO and Consuelo ZAMARRIPA purchase a significant amount of ammunition from a sporting goods store in Edinburg, Texas. HSI Agents observed LUCIO and Consuelo ZAMARRIPA load the ammunition into a black Chrysler 300 (hereinafter referred to as "Target Vehicle") and observed them depart the sporting goods store. HSI Agents followed LUCIO and Consuelo ZAMARRIPA from the sporting goods store to Consuelo ZAMARRIPA's residence in Rio Grande City, Texas (hereinafter referred to as "Target Residence").
- II. HSI Agents established surveillance of the Target Residence and later observed LUCIO depart the Target Residence and drive towards the Rio Grande City, Texas Port of Entry (POE) in Rio Grande City, Texas. HSI Agents advised U.S. Customs and Border Protection officers (CBPOs) of their observations related to LUCIO and Consuelo ZAMARRIPA. CBPOs intercepted the Target Vehicle/LUCIO at the Rio Grande City, Texas POE as LUCIO attempted to depart the United States into Mexico. CBPOs conducted an outbound inspection of the Target Vehicle/LUCIO and discovered approximately 2,000 rounds of 7.62x39mm caliber ammunition concealed within a large speaker box of the Target Vehicle. HSI Agents arrested LUCIO (M-17-1583-M) at the Rio Grande City, Texas POE.
- III. At the Rio Grande City, Texas POE, HSI Agents conducted a post-Miranda interview of LUCIO. LUCIO admitted to attempting to smuggle and illegally export the ammunition unlawfully from the United States into Mexico. LUCIO admitted that Consuelo ZAMARRIPA assisted her with procuring the ammunition and that Consuelo ZAMARRIPA was aware the ammunition would be smuggled and illegally exported from the United States into Mexico. Furthermore, LUCIO identified Edna Yaritza ZAMARRIPA as the individual who recruited her to procure and illegally export the ammunition from the United States into Mexico.
- IV. On or about June 6, 2018, HSI SAs and Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) SAs interviewed Edna ZAMARRIPA and Consuelo ZAMARRIPA at the Target Residence. Edna ZAMARRIPA admitted to recruiting LUCIO to procure and illegally export ammunition from the United States into Mexico. Edna ZAMARRIPA admitted that she had previously procured ammunition and a semi-automatic type firearm from the United States for an individual in Mexico. Consuelo ZAMARRIPA admitted to procuring and purchasing the ammunition referenced in Paragraph I. Consuelo ZAMARRIPA further admitted that she knew it was illegal to export ammunition from the United States into Mexico.
- V. According to the U.S. Department of State, Office of Defense Trade Controls Compliance (DTCC), the ammunition seized from LUCIO was determined to be a defense article described on the United States Munitions List (USML) and regulated for export pursuant to the Arms Export Control Act (Title 22 United States Code 2778).